

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the Commonwealth.

ORDER GRANTING THREE HUNDRED SIXTY-FOURTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CLAIMS ASSERTING LIABILITIES OWED BY ENTITIES THAT ARE NOT TITLE III DEBTORS

Upon the *Three Hundred Sixty-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17910] (the “Three Hundred Sixty-Fourth Omnibus Objection”),² filed by the Commonwealth of Puerto Rico (“Commonwealth”), dated August 20, 2021, for entry of an

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Sixty-Fourth Omnibus Objection.

order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Three Hundred Sixty-Fourth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Sixty-Fourth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Sixty-Fourth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Three Hundred Sixty-Fourth Omnibus Objection (collectively, the “Claims to Be Disallowed”) having failed to comply with the applicable rules for filing a proof of claim; and the Court having determined that the relief sought in the Three Hundred Sixty-Fourth Omnibus Objection is in the best interests of the Commonwealth, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Sixty-Fourth Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Sixty-Fourth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to delete the Deficient Claims from the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 17910 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Three Hundred Sixty-Fourth Omnibus Objection

Three Hundred and Sixty-Fourth Omnibus Objection
Exhibit A - Claims to Be Disallowed

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|--|------------|-----------------|-----------------------------|---------|-----------------------|
| 1 | BANKRUPTCY ESTATE OF FIDDLER GONZALEZ & RODRIGUEZ PMB 136 400 CALLE JUAN CALAF SAN JUAN, PR 00918-1314 | 6/27/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 82426 | \$ 132,612.70 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and University of Puerto Rico which is not part of the Title III proceedings. | | | | | | |
| 2 | BIOIMAGENES MEDICAS 351 AVE HOSTOS EDIF MEDICAL EMPORIUM STE 110 MAYAGUEZ, PR 00682 | 5/28/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 24204 | \$ 191.80 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Automobile Accident Compensation Administration which is not part of the Title III proceedings. | | | | | | |
| 3 | BIOIMAGENES MEDICAS 351 AVE HOSTOS EDIF MEDICAL EMPORIUM STE 110 MAYAGUEZ, PR 00682 | 5/28/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 24218 | \$ 34,882.30 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and State Insurance Fund which is not part of the Title III proceedings. | | | | | | |
| 4 | CARIBBEAN MEDICAL CENTER DEPARTAMENTO DE FINANZAS PO BOX 70006 FAJARDO, PR 00738 | 5/21/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 16893 | \$ 2,188,743.24* |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and PR Health Insurance Administration which is not part of the Title III proceedings. | | | | | | |
| 5 | CARIS NURSERY INC 183 CALLE DELBREY SAN JUAN, PR 00911-2007 | 3/22/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 2361 | \$ 622.97 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and State Insurance Fund, which is not part of the Title III proceedings. | | | | | | |
| 6 | CARLOS M FLORES CE & L FIRE EXTINGUISHERS PO BOX 3092 BAYAMON, PR 00960 | 5/7/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 12462 | Undetermined* |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and State Insurance Fund which is not part of the Title III proceedings. | | | | | | |

Three Hundred and Sixty-Fourth Omnibus Objection
Exhibit A - Claims to Be Disallowed

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|---|--|------------|-----------------|-----------------------------|---------|-----------------------|
| 7 | DELGADO CRUZ, EDWIN HC 50 BOX 40558 SAN LORENZO, PR 00754-9818 | 5/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 28514 | \$ 6,791.00 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and The Insurance Commission which is not part of the Title III proceedings. | | | | | | |
| 8 | G WORKS, INC. GRETCHEN B. GUZMAN URB. TORREMOLINOS CALLE MARGINAL 177, A-13 GUAYNABO, PR 00969-3747 | 5/25/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 30173 | \$ 140,701.62 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Municipality of Juncos which is not part of the Title III proceedings. | | | | | | |
| 9 | INMOBILIARIA Y DESARRALLA DORA PUERTO RICO VS INC PARK ROYAL CLUB CALA 50 CLUB CALA DRIVE HUMACAO, PR 00791 | 5/18/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 16878-1 | \$ 147,096.49 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation show liability in the amount of \$147,096.49 against the Centro de Recaudacion de Ingresos Municipales (CRIM), which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever. | | | | | | |
| 10 | LABORATORIO CLINICO JUNCOS INC PO BOX 1920 JUNCOS, PR 00777 | 6/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 82133 | \$ 6,513.00 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Administración de Seguros de Salud de Puerto Rico which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever. | | | | | | |
| 11 | MIR, ROSA JULIA 5553 TAFOYA CIRCLE WEST JORDAN, UT 84081 | 8/7/2017 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 9 | \$ 46,000.00* |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Municipal Revenue Collection Center which is not part of the Title III proceedings. | | | | | | |
| 12 | MMM HEALTHCARE, LLC CARLOS VIVALDI PO BOX 71114 SAN JUAN, PR 00936-8014 | 6/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 162265 | \$ 3,396,098.31 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and PR Health Insurance Administration which is not part of the Title III proceedings. | | | | | | |

Three Hundred and Sixty-Fourth Omnibus Objection
Exhibit A - Claims to Be Disallowed

| | NAME | DATE FILED | CASE NUMBER | DEBTOR | CLAIM # | ASSERTED CLAIM AMOUNT |
|--|---|------------|-----------------|-----------------------------|---------|-------------------------|
| 13 | MMM MULTIHEALTH, LLC CARLOS VIVALDI PO BOX 71114 SAN JUAN, PR 00936-8014 | 6/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 153940 | \$ 8,882,817.61 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and PR Health Insurance Administration which is not part of the Title III proceedings. | | | | | | |
| 14 | MOLINA HEALTHCARE OF PUERTO RICO, INC. 654 MUÑOZ RIVERA AVE., SUITE 1600 SAN JUAN, PR 00918 | 6/29/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 81820 | \$ 22,403,539.89 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and State Insurance Fund which is not part of the Title III proceedings. A portion of this claim asserts liabilities related to Tax Credits. Because this objection does not constitute an objection to the portion of the claim that asserts Tax Credits, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever. | | | | | | |
| 15 | NAZARIO PADRO, DARIO HC 1 BOX 8045 SAN GERMAN, PR 00683 | 6/25/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 86303 | Undetermined* |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Centro de Recaudacion de Ingresos Municipales (CRIM) which is not part of the Title III proceedings. A portion of this claim has been transferred into the Administrative Claims Reconciliation (ACR) process and will be resolved consistent with the ACR procedures. Because this objection does not constitute an objection to the portion of the claim in the ACR process, the Debtors' reserve their rights to object to the remaining portion of the claim on any other grounds whatsoever. | | | | | | |
| 16 | SANTOS NIEVES, AHILIS HC 73 BOX 4371 NARANJITO, PR 00719 | 6/26/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 71878 | \$ 4,000.00* |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and State Insurance Fund which is not part of the Title III proceedings. | | | | | | |
| 17 | VITALIFE INC 1590 CALLE CAVALIERI SAN JUAN, PR 00927-6129 | 5/25/2018 | 17 BK 03283-LTS | Commonwealth of Puerto Rico | 36522 | \$ 1,209,774.14 |
| Reason: Proof of Claim fails to provide a basis for asserting a claim against Commonwealth of Puerto Rico. Proof of Claim and supporting documentation only show liability between Claimant and Administración de Centro Medico, Hospital Universitario Dr. Ramón Ruiz Arnau, Hospital Universitario De Adulto, Hospital Pediátrico Universitario, or Administracion de Seguros De Salud de Puerto Rico, which are not part of the Title III proceedings. | | | | | | |
| | | | | | | TOTAL \$ 38,600,385.07* |